<i>4</i>) . · ·	TE TIAL HAIN-TONG WASTE SUTE COENTIFICATION DOWNS
SITE NAME O	RATIONALE FOR FINAL STRATEGY DETERMINATION DO5582/0//
	vot Dew Chemical USA @ 428 1 hacher Drive
Youngst	own this 144509 Mahoning 1099 17
	10NTH / DAY / YEAR MONTH / DAY / YEAR PRE HRS SCORE
PLEASE CIRC	LE CORRECT CODE
402	RCRA TSD - Permitted or closure candidates not to be listed. Excluded by policy.
412	UST - Under RCRA, leaking underground storage tanks. Gasoline and petroleum products including used oil. NOTE: waste oil is CERCLA eligible.
401	Oil/gas - Natural gas, natural gas liquids liquefied natural gas, synthetic gas usable for fuel. Petroleum, crude oil or any fraction thereof.
407	Federal Facility - Federal agency financed from appropriations to the agency not Superfund. Investigated under Installation Restoration Program. (Department of Defense or similar program.) Excluded by policy.
408	Mining - Until HRS revision is completed by April 1988, sites cannot be scored. Dat is usually high volume, low toxicity wastes. Wastes include those from mining; exploration, development or production of crude oil, natural gas or geothermal ener and dust from cement kilns.
410	FIFRA - Application of pesticides registered under FIFRA, or the handling and storge of such a pesticide by an agricultural procducer. Excluded by policy.
416	Radiation - Releases of source, by product or special nuclear material. Covered under Section 170 of Atomic Energy Act, Nuclear Regulatory Commission (NRC), Uranium Mill Tailings Radiation Control Act (UMTRCA). Excluded by statute.
414/415	Special Wastes - Such as, brine, animal feed, and grain elevators are not covered under current HRS model. Excluded by policy.
411	Fly-Ash - With respect to sites with substantial volumes of fly ash and others wastes from coal and fossil fiels burning. Iso non use unsil HPS is revised in April 1988. Can not base evaluation made principally on the volume of those wastes but rather on the concentrations of the hazardous constituents of the waste.
409	TSCA - Permitted or candidates not to be listed. Excluded by policy.
403/413	Non Hazardous Substances - Substances not meeting the definition of being hazardous
404 (405) (40)	6 SITE REDUIRED NO ADDITIONAL RESPONSE. NFA 5E0401-104040405-406
	FURTHER RESEARCH AND ANALYSIS REDUIRED, REDIFFEND SITE IMSPECTION
Nona Will	D. Messenger Summer Ade 8/6/87
	1 1 JUL 1988

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ecology and environment, inc.

223 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60606, TEL. 312-663-9415

International Specialists in the Environmental Sciences

DATE:

November 20, 1980

TO:

File

FROM:

Royce Freese

RE:

Ohio/TDD# F5-8010-13 Youngstown/Dowell (Dow)

Pursuant to hotline call #783, Max Michael, Renee Hix, and myself attempted to perform an on-site inspection of the above referenced site.

We were advised by Dick Onan, Environmental Manager, N.E. District, that an on-site inspection would be prohibited at this time. The reason given was that Dowell did not feel the EPA's "Memorandum on Confidential Treatment of Certain Information Statement" met their secrecy requirements. It was insisted that in order for us to conduct an inspection, we must use a Statement of Confidentiality prepared by Dowell.

Bill Getchy, Manager of Dow, synopsized the operation of his 3-4 acre site and it is now felt an on-site inspection is not critical at this time.

The main function of the plant is to store raw material used to clean industrial steam boilers, heat exchangers, dewax oil and gas wells and other general industrial services. A typical operation is described below.

One of Dowell's 15 to 20 tank wagons is filled with dilute hydrochloric acid with other cleaning materials forming a cleaning solution. The solution is transported to the client's facility where it is forced under pressure into the boiler and is then diluted in situ. Dowell supplies their clients with two disposal services for the spent cleaning solution, but the method of disposal is the client's choice. The tank truck returns to Dowell's plant with a residual of a few gallons that eventually accumulates to approximately 300 gallons per day. This remaining cleaning solution is neutralized on-site and then sewered.

Dowell considers their customers, whose equipment is being cleaned, as the waste generators. It is insisted by Mr. Getchy that Dowell's trucks are never used to transport spent cleaning solution.

It is recommended that a RCRA inspection be conducted at this facility. Also, the EPA should address the classification and disposal of the spent cleaning solution after its removal from the boilers at the client's facility.

RF/ct